

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF ANDREA PALLIOS
ROBERTS IN SUPPORT OF PLAINTIFF
WAYMO LLC'S RESPONSE TO
COURT INQUIRY RE UBER'S FAILURE
TO PRODUCE JACOBS LETTER AND
EMAIL**

1 I, Andrea Pallios Roberts, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an attorney at Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit 1 is a true and correct copy of RFP Nos. 28-30, 72, 73 and 91
7 from Waymo's First Set of Requests for Productions.

8 3. Attached as Exhibit 2 is a true and correct copy of Expedited Interrogatory Nos. 1,
9 3 and 6 from Waymo's First Set of Expedited Interrogatories.

10 4. Attached as Exhibit 3 is a true and correct copy of Common Interrogatory No. 8
11 from Waymo's Third Set of Common Interrogatories.

12 5. Attached as Exhibit 4 is a true and correct copy of excerpts from the October 2,
13 2017 deposition of A. Padilla.

14 6. Attached as Exhibit 5 is a true and correct copy of a July 25, 2017 letter from A.
15 Roberts to M. Pritt, counsel for Uber.

16 7. Attached as Exhibit 6 is a true and correct copy of a July 3, 2017 email from A.
17 Roberts to E. Takashima, counsel for Uber.

18 8. Attached as Exhibit 7 is a true and correct copy of a July 3, 2017 email from S,
19 Rivera to Special Master J. Cooper, all counsel for Waymo, and all counsel for Uber.

20 9. Attached as Exhibit 8 is a true and correct copy of R. Jacobs' resignation email,
21 with Bates number UBER00326403.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3
4 DATED: December 4, 2017

/s/ Andrea Pallios Roberts

Andrea Pallios Roberts

5
6 **SIGNATURE ATTESTATION**

7 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
8 filing of this document has been obtained from Andrea Pallios Roberts.

9
10
11 /s/ Charles K. Verhoeven

Charles K. Verhoeven